Susheel Kirpalani
Andrew J. Rossman
James C. Tecce
Tyler G. Whitmer
QUINN EMANUEL URQUHART & SULLIVAN, LLP
Counsel to Lehman Brothers Holdings Inc. and the
Official Committee of Unsecured Creditors of Lehman
Brothers Holdings Inc.

UNITED STATES	BANKRU	PTCY	COURT
SOUTHERN DIST	RICT OF	NEW Y	VORK

	X	
In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	, ,
	:	
Debtors.	:	
	X	
In re:	:	SIPA
	:	Case No. 08-01420 (SCC)
LEHMAN BROTHERS INC.,	:	, ,
	:	
Debtor.	:	
	X	

CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING MOTION OF LEHMAN BROTHERS HOLDINGS INC. AND OFFICIAL COMMITTEE OF UNSECURED CREDITORS, PURSUANT TO FED. R. BANKR. P. 9019 AND 11 U.S.C. § 105(a), FOR ENTRY OF ORDER APPROVING SETTLEMENT AGREEMENT WITH JPMORGAN CHASE BANK, N.A. AND CERTAIN OF ITS AFFILIATES

TO THE HONORABLE SHELLEY C. CHAPMAN UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with both the Order Modifying Certain Existing Claims Orders [ECF No. 29505] and the Second Amended Order Pursuant To Section 105(a) Of Bankruptcy Code And Bankruptcy Rules 1015(c) And 9007 Implementing Certain Notice And Case Management Procedures [ECF No. 9635] (the "Case Management Order"), the undersigned hereby certifies as follows.

- 1. On February 1, 2017, Lehman Brothers Holdings Inc., as Plan Administrator (the "Plan Administrator"), and the Official Committee of Unsecured Creditors, through its Litigation Subcommittee (the "Committee"), filed with the Court for hearing on February 16, 2017 the Motion, Pursuant To Fed. R. Bankr. P. 9019 And 11 U.S.C. § 105(a), For Entry Of Order Approving Settlement With JPMorgan Chase Bank, N.A. And Certain Of Its Affiliates [ECF No. 54683] (the "Settlement Motion"). Capitalized terms not defined herein have the meanings ascribed to them in the Settlement Motion.
- 2. The Plan Administrator established a deadline (the "Response Deadline") for parties to object or file responses to the Settlement Motion of February 13, 2017 at 4:00 p.m. (Prevailing Eastern Time). The Plan Administrator noticed a hearing with respect to the Settlement Motion for February 16, 2017 at 9:30 a.m. (Prevailing Eastern Time).
- 3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket in the above-referenced cases in accordance with the procedures set forth in the Case Management Order, or (b) served on counsel to the Plan Administrator or the Committee with respect to the Settlement Motion.

[Remainder of page intentionally left blank]

WHEREFORE, the Plan Administrator and the Committee respectfully request that the Court enter the proposed Order granting the Settlement Motion annexed hereto as **Exhibit 1** during the hearing on February 16, 2017.

Dated: February 14, 2017 New York, New York

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Andrew J. Rossman

Susheel Kirpalani Andrew J. Rossman James C. Tecce Tyler G. Whitmer

Counsel to Lehman Brothers Holdings Inc. and the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc